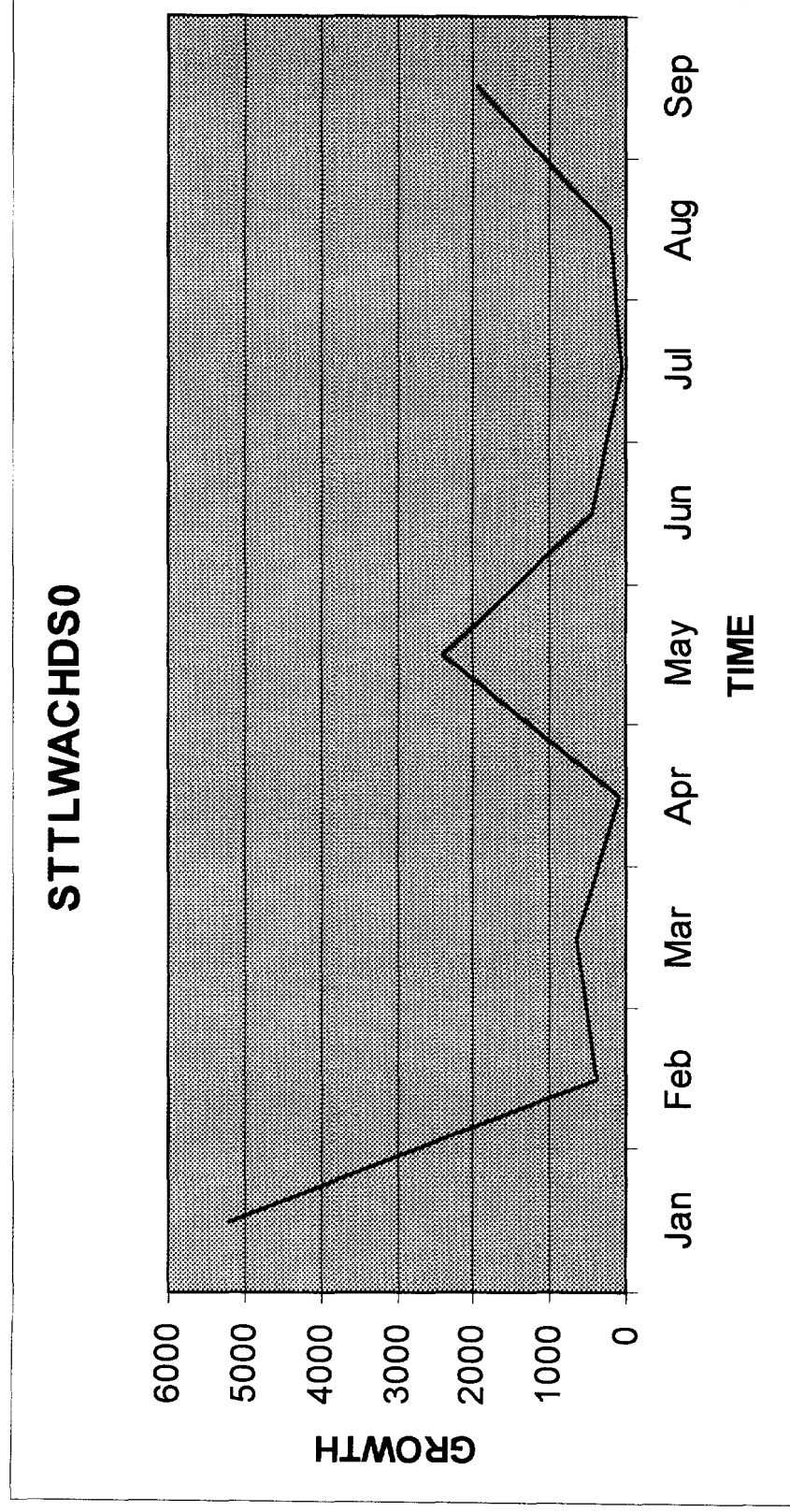
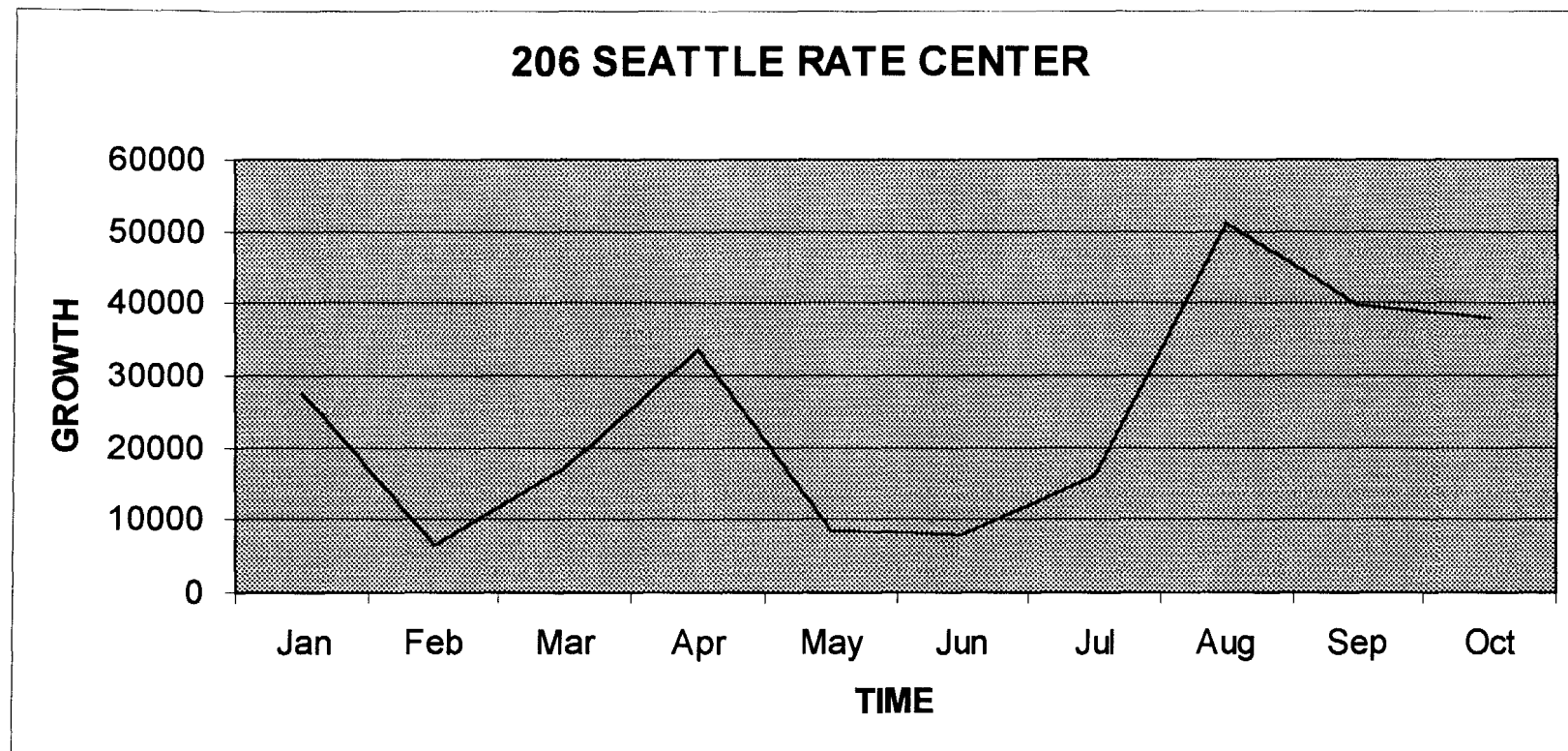


Washington Switch Data



Washington Switch Data



Colorado RC Data

RATE CENTER: 303 DENVER - 52 Switches RC MTE is 7 Months

SWITCH	POOLING DATE	MTE	POTENTIAL HELD ORDERS
BLDRCOMADS0	Mar-01	0	<i>Dec-00</i>
DNVRCOCHCG0	Mar-01	0	<i>Dec-00</i>
DNVRCOCPDS0	Mar-01	0	<i>Dec-00</i>
DNVRCODCDS0	Mar-01	0	<i>Dec-00</i>
ENWDCOABDS0	Mar-01	1	<i>Dec-00</i>
LTTNCOMADS0	Mar-01	1	<i>Dec-00</i>
DNVRCOSHDS0	Mar-01	2	<i>Jan-01</i>
MRSNCOMARS1	Mar-01	2	<i>Jan-01</i>
DNVRCOCLDS0	Mar-01	3	<i>Feb-01</i>
DNVRCOCWDS0	Mar-01	3	<i>Feb-01</i>
DNVRCOMADS0	Mar-01	3	<i>Feb-01</i>
DNVRDOWSDS0	Mar-01	3	<i>Feb-01</i>
ARVDCOMADS0	Mar-01	6	<i>May-01</i>
BLDRCOGBRS1	Mar-01	6	<i>May-01</i>
TEMACOMADS0	Mar-01	7	<i>Jun-01</i>
DNVRCOSWDS0	Mar-01	8	<i>Jul-01</i>

Out of 52 Switches, these 16 are in jeopardy of taking held orders before the "Mandated Pooling Date"

Out of those 16 Switches, 6 are in jeopardy of taking held orders within November and December 2000

Arizona RC Data - 480

RATE CENTER: 480 PHOENIX - 22 Switches RC MTE is 9

SWITCH	ESTIMATED POOLING DATE	MTE	POTENTIAL HELD ORDERs
HGLYAZMADS0	Jul-01	0	<i>Dec-00</i>
CHNDAZWEDS0	Jul-01	1	<i>Dec-00</i>
CVCKAZMADS0	Jul-01	1	<i>Dec-00</i>
MESAAZMADS0	Jul-01	2	<i>Jan-01</i>
CHNDAZMADS0	Jul-01	3	<i>Feb-01</i>
TEMPAZMADS0	Jul-01	3	<i>Feb-01</i>
SCDLAZSHDS0	Jul-01	6	<i>May-01</i>
CHNDAZSODS0	Jul-01	8	<i>Jul-01</i>

Out of 21 Switches, these 8 are in jeopardy of taking held orders before the "Estimated Pooling Date"

Out of those 8 Switches, 3 are in jeopardy of taking held orders within November and December 2000

Arizona RC Data - 520

RATE CENTER: 520 TUCSON - 22 Switches RC MTE is 2

SWITCH	ESTIMATED POOLING DATE	MTE	POTENITAL HELD ORDER
• TCSNAZEADS0	Jul-01	0	<i>Dec-00</i>
• TCSNAZSODS0	Jul-01	0	<i>Dec-00</i>
• TCSNAZMADS1	Jul-01	1	<i>Dec-00</i>
• TCSNAZNODS0	Jul-01	1	<i>Dec-00</i>
• TCSNAZCRDS0	Jul-01	2	<i>Jan-01</i>
• TCSNAZRND0	Jul-01	3	<i>Feb-01</i>
•			

Out of 22 Switches, these 6 are in jeopardy of taking held orders before the "Estimated Pooling Date"

Out of those 6 Switches, 4 are in jeopardy of taking held orders within November and December 2000

Arizona Data - 602

RATE CENTER: 602 PHOENIX - 15 Switches

RC MTE is 4

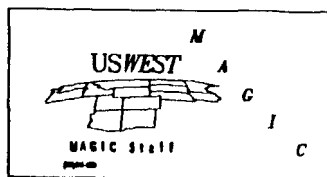
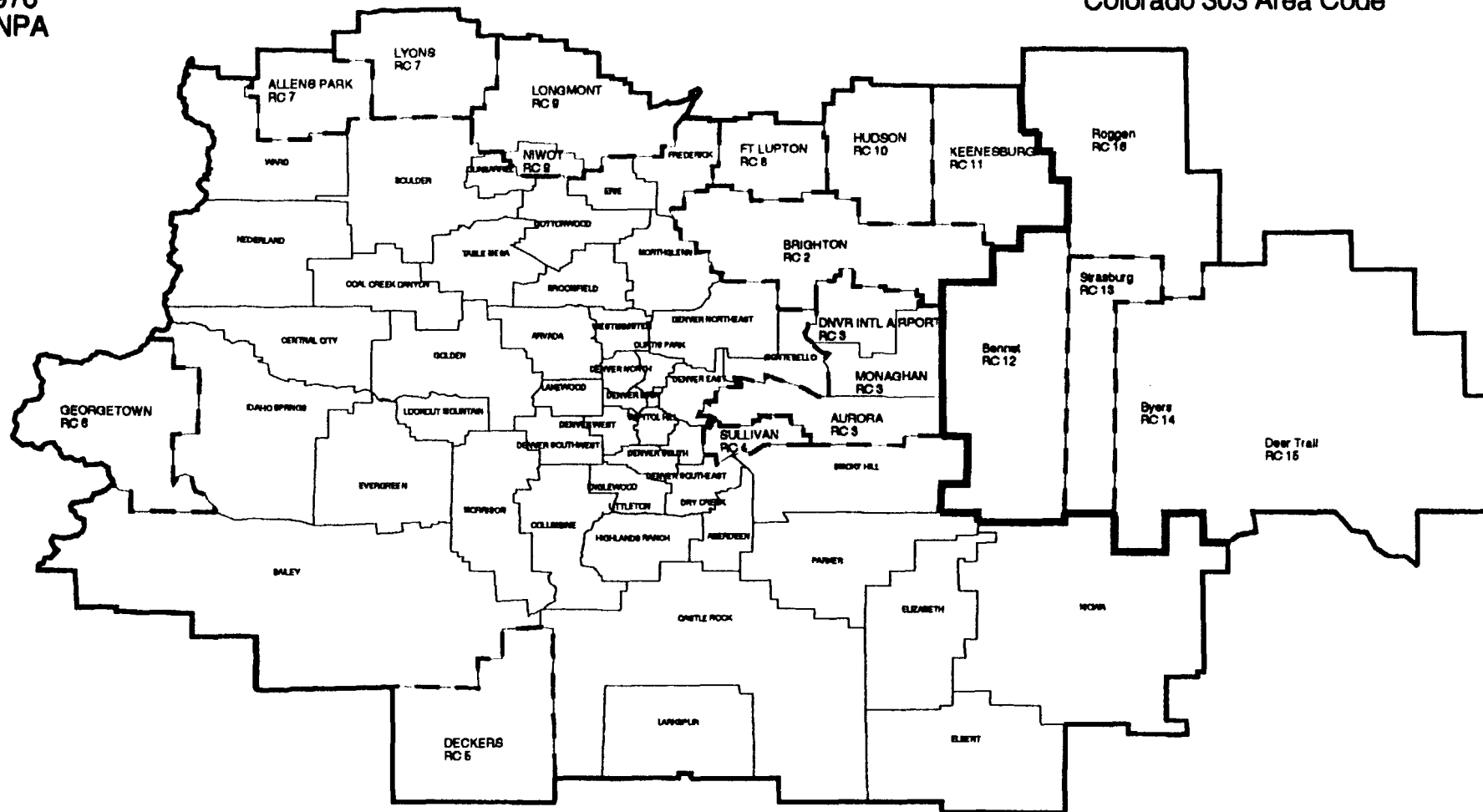
SWITCH	ESTIMATED POOLING DATE	MTE	POTENTIAL HELD ORDER
PHNXAZCADS0	Jul-01	0	<i>Dec-00</i>
PHNXAZWEDS0	Jul-01	1	<i>Dec-00</i>
PHNXAZNEDS0	Jul-01	2	<i>Jan-01</i>
PHNXAZNODS3	Jul-01	2	<i>Jan-01</i>
PHNXAZMADS1	Jul-01	3	<i>Feb-01</i>
PHNXAZEADS0	Jul-01	5	<i>Apr-01</i>
PHNXAZSEDS0	Jul-01	6	<i>May-01</i>
PHNXAZMADS4	Jul-01	8	<i>Jul-01</i>

Out of 15 Switches, these 8 are in jeopardy of taking held orders before the "Estimated Pooling Date"

Out of those 8 Switches, 2 are in jeopardy of taking held orders within November and December 2000

970
NPA

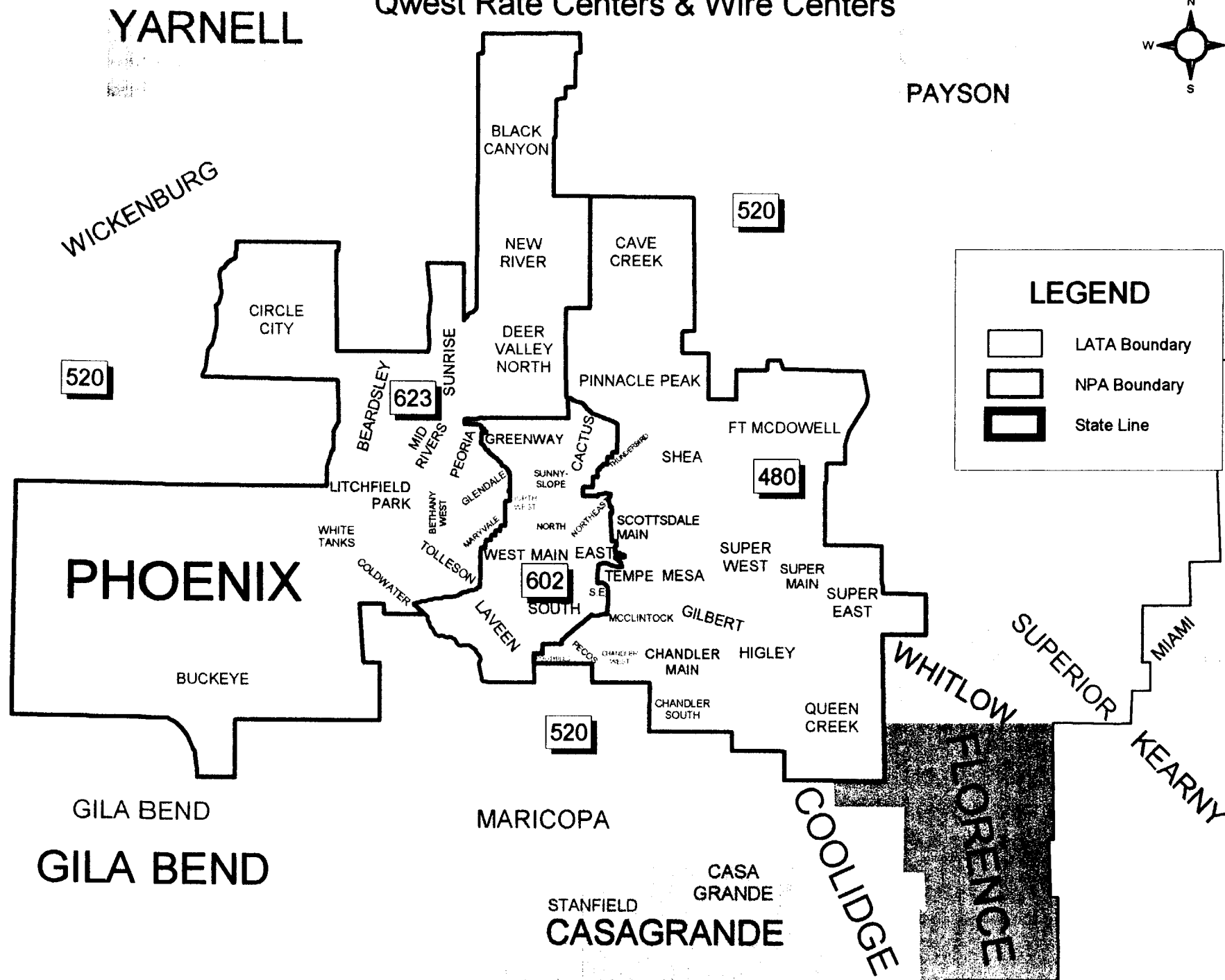
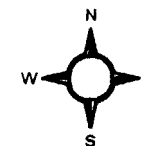
Colorado Rate Center Consolidation
Denver Metro Area
Colorado 303 Area Code

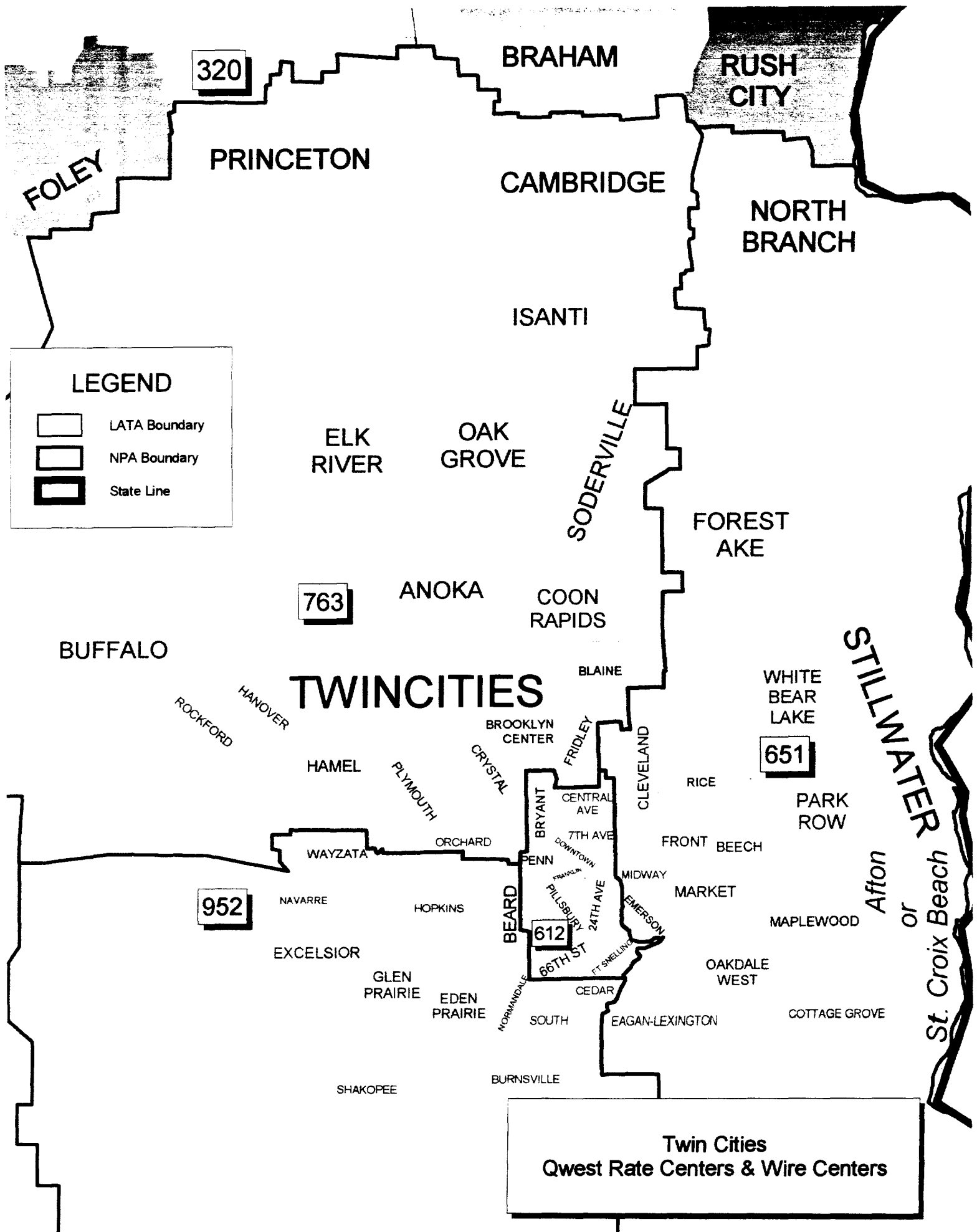


719
NPA



Qwest Rate Centers & Wire Centers





Number Resource Optimization

CC Docket No. 99-200

Part II

November 27, 2000

Bill Johnston, Elridge Stafford

Mike Whaley

Agenda of Issues Part II

- **Need for Resellers to abide by Reporting Requirements**
- **UNP**
- **State Pooling Trial Concerns**

Reporting Requirements for Resellers is Needed

- **Resellers can circumvent prescribed FCC rules regarding numbering resource optimization and accountability.**
 - **Resellers do not have to report telephone numbers they hold.**
 - **They do not have to report any utilization.**
 - **They can obtain individual, specific numbers (vanity or one of a kind).**
- **Resellers can create a storehouse of numbers of any amount without any oversight or controls.**

Reporting Requirements for Resellers is Needed

- **Resellers are not subject to audits by the NANPA, the Pooling Administrator or the FCC.**
- **A reseller's utilization will increase the number of contaminated blocks a "host" carrier must maintain and possibly contribute to pooling.**
- **Resellers do not have to abide by "Reserved" number constraints. They can reserve numbers for as long as they wish without having to return them.**
- **Resellers create a demand for numbers that cannot be forecasted by the "host" carrier.**

Reporting Requirements for Resellers is Needed

- **Resellers do not have to forecast demand for numbers, thus jeopardizing the ability to properly plan, either at the carrier or the Pooling Administrator level.**
- **Resellers can do this without cost, while the carriers must bear the burden of paying for the administration of the numbers.**
- **Today, resellers can obtain numbers from carriers, and then port them to their own facilities based switch.**
- **Resellers should be treated as all other carriers with regard to numbering resources.**

Unassigned Number Porting (UNP)

- **UNP would allow carriers to circumvent the established qualification criteria for obtaining numbering resources.**
- **UNP is NOT a number conservation issue. It is an issue to be left between carriers on a voluntary basis. However, it must be managed by a neutral 3rd party administrator for oversight and control. Absent an administrator, there will be no way to ensure requested numbers are truly needed, denials are legitimate, or a particular service provider is being unfairly targeted as a donor.**

Unassigned Number Porting (UNP)

- **Implementation of the national 1K pooling should be the industry's first priority; followed by an assessment of the impact on the NPAC, LNP network and supporting OSSs before considering new number conservation measures**
- **UNP is number administration by one carrier for others. Qwest and other incumbent carriers were required by law to transition number administration to a neutral 3rd party administrator. We do not want this responsibility back.**

Unassigned Number Porting (UNP)

- **Utilization thresholds are being adopted to limit and optimize the inventories of carriers with low utilization.**
- **National rollout of 1K pooling should not be hindered by another unproven number administration measure, such as UNP.**
- **UNP will compete for resources in a 1K pooling environment.**
- **1K Pooling must be given a chance to work**

Unassigned Number Porting (UNP)

- **UNP would allow carriers to pursue additional numbers from another carrier's inventory, circumventing the utilization controls already mandated.**
- **UNP would further deplete the donating carrier's inventory, causing them to constantly re-forecast their demand and return to the pool for additional resources**
- **UNP allows a carrier to obtain numbers at the expense of its competitor.**

Unassigned Number Porting (UNP)

- **The burden of the work and administrative cost fall to the donating carrier.**
- **The donating carrier would pay the port transaction fees with no associated revenue or compensation for the cost.**
- **UNP would require additional significant changes to current LNP processes.**
- **Current LNP architecture was designed to support porting of working TNs.**
- **Non-working numbers cannot be ported today using existing mechanized systems.**

Unassigned Number Porting (UNP)

- **UNP may result in greater capacity and performance requirements for NPAC systems.**
- **UNP would not be limited to just a few carriers wanting just a few numbers. See the UNP Senarios 1&2.**
- **A donating carrier might be required to donate to as many as 80 or more UNP requesting carriers (Utah)**
- **Competing carriers will target large business customers, and the quantity of numbers requested would quickly exceed the “few numbers” being argued today**

State Pooling Trials - Concerns

- **Qwest is faced with a scheduling dilemma. The NRO Order specified 3 NPAs per region per quarter. Qwest was planning to deploy pooling, using the national guidelines, per the Commissions order.**
- **Now that states have been granted authority to deploy trials, Qwest is faced with having to do 4 NPAs in the first quarter, with a possibility of deploying as many as 10 in the following quarter.**
- **Qwest's concern is our resource limitation if we try to deploy more than what is currently scheduled for in the first quarter.**
- **Also, Qwest will be working with two different PAs (Telecordia and Neustar)**
- **Many states want to roll out pooling quickly.**
- **Clarification on trials would be helpful. States want to do entire NPAs, multiple MSAs, multiple NPAs, multiple NPAs and MSAs. Many of the targeted areas are outside of the MSAs and will not provide significant conservation.**

State Pooling Trials Summary

- **Qwest Pooling Trial Schedule**

Colorado	March 10, 2001
Nebraska	February 17, 2001
Utah	March 1, 2001
Washington	2nd Quarter 2001

- **Qwest States Authorized to Conduct Trials**

Arizona
Iowa
Oregon

- **Pending FCC approval**

Minnesota

State Pooling Trials Summary

- Deployment Schedule Ordered

• Nebraska	Omaha MSA (402)	February 17, 2001
• Colorado	Denver MSA (720&303)	March 10, 2001
• Utah	801 NPA	March 1, 2001
• Washington	Seattle CMSA or Outstate	June, 2001
•	(360 or 206,425 & 253)	and October 2001
• Arizona	602,480,623 & 520	<i>Authorized</i>
• Iowa	319,515 & 641	<i>Authorized</i>
• Oregon	503,541 & 971	<i>Authorized</i>
• Minnesota	612,650,952 & 763	Authorization requested

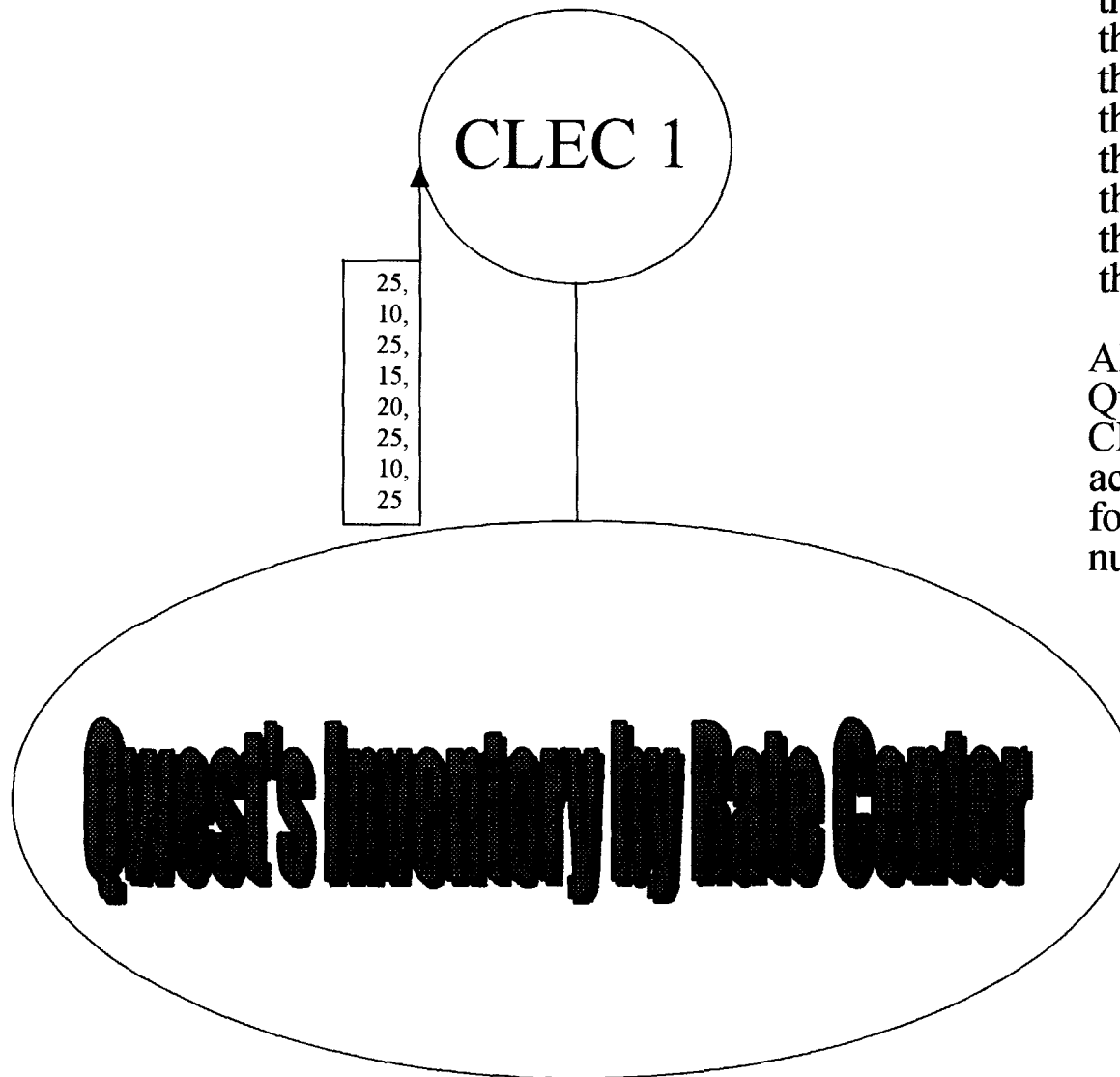
Utilization Threshold

- **Utilization threshold should be set initially at 55%, and grow annually by 5% to a cap of 70%**
- **Exceptions should be allowed on a case-by-case basis for situations such as rate centers with an unusual mix of rural and urban switches**
- **Once the utilization threshold is established, the Months-to-Exhaust requirements should be eliminated.**

Scenario 1

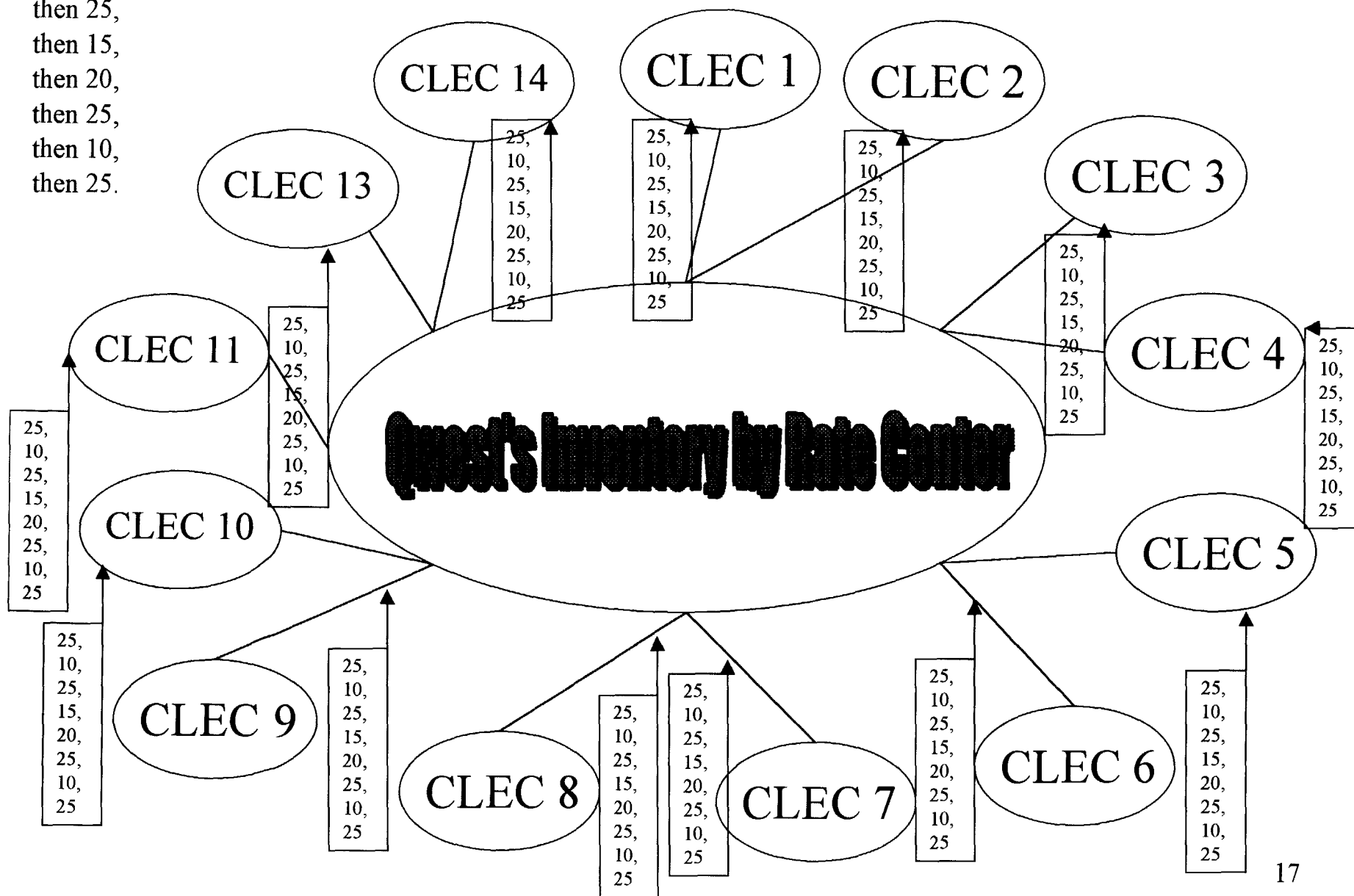
CLEC wants just 25 numbers,
then 25 more,
then 10 more,
then 25,
then 15,
then 20,
then 25,
then 10,
then 25.

All at Qwest's expense and for
Qwest to track and report.
CLEC does not have to be
accountable for utilization,
forecasting, reporting on these
numbers..



Now the CLECs **each** want, for themselves, first just 25 numbers,
 then 25 more,
 then 10 more,
 then 25,
 then 15,
 then 20,
 then 25,
 then 10,
 then 25.

Scenario 2



There are 80 CLECs as there are in the 801 NPA